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Attorneys for 130 Cedar Street Defendants

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

MASTER CASE NO.  
21 MC 102 (AKH)

-----X  
LUIS VIVAR,

DOCKET NO.  
07 CV 4523

Plaintiff,

-against-

90 CHURCH STREET LIMITED PARTNERSHIP, ET AL.,

NOTICE OF THE 130  
CEDAR STREET  
DEFENDANTS'  
ADOPTION OF ANSWER  
TO MASTER COMPLAINT

Defendants.

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**PLEASE TAKE NOTICE** that defendants AJ GOLDSTEIN & CO., INC. i/s/h/a AJ GOLDSTEIN & CO., CAROL GAYNOR, AS TRUSTEE OF THE CAROL GAYNOR TRUST, CAROL GAYNOR, AS TRUSTEE OF THE CAROL GAYNOR TRUST i/s/h/a CAROL GAYNOR TRUST, MATTHEW A. GELBIN, AS TRUSTEE OF THE GELBIN FAMILY TRUST, NATALIE S. LEBOW, AS TRUSTEE OF THE JERRY P. LEBOW FAMILY TRUST i/s/h/a NATALIE S. LEBOW, AS TRUSTEE OF THE JEREMIAH PHILIP LEBOW REVOCABLE TRUST, PAMELA BETH KLEIN AND ROWAN K. KLEIN, AS TRUSTEES OF THE PAMELA AND ROWAN KLEIN TRUST i/s/h/a PAMELA BETH KLEIN, AS TRUSTEES OF THE PAMELA AND ROWAN KLEIN TRUST AND ROWAN K. KLEIN, AS TRUSTEES OF THE PAMELA AND ROWAN KLEIN TRUST, FRED GOLDSTEIN,

MARGARET G. WATERS, MARGUERITE K. LEWIS AND WILLIAM A. GOLDSTEIN, AS TRUSTEES UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN i/s/h/a MARGUERITE K. LEWIS, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, HAROLD G. GOLDSTEIN AND IDELL GOLDSTEIN, AS TRUSTEES UNDER DECLARATION OF TRUST i/s/h/a HAROLD G. GOLDSTEIN, AS TRUSTEE UNDER DECLARATION OF TRUST AND IDELL GOLDSTEIN, AS TRUSTEE UNDER DECLARATION OF TRUST, SHIRLEY G. SHOCKLEY, AS TRUSTEE UNDER DECLARATION OF TRUST and ALAN L. MERRIL (collectively referred hereto as "130 CEDAR STREET DEFENDANTS") as and for their responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopts the 130 CEDAR STREET DEFENDANTS' Answer to Master Complaint, including all affirmative defenses and jury demand dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). 130 CEDAR STREET DEFENDANTS also adopt the response contained in any Amended Answer filed and served herein.

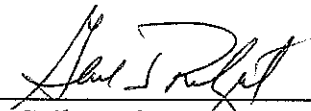
**PLEASE TAKE FURTHER NOTICE**, that 130 CEDAR STREET DEFENDANTS reserve the right to file an Amended Answer and the right to interpose Cross-Claims against any and all defendants and third-party defendants.

**WHEREFORE**, the 130 CEDAR STREET DEFENDANTS demand judgment dismissing the above-captioned action as against each of them, together with their costs and disbursements.

Dated: Mineola, New York  
September 17, 2007

**HAVKINS ROSENFELD RITZERT  
& VARRIALE, LLP**

By: \_\_\_\_\_



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File No. 03138-0405

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